

PHILLIP A. TALBERT  
United States Attorney  
KEVIN C. KHASIGIAN  
Assistant U. S. Attorney  
501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700

Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$106,590.00 IN  
U.S. CURRENCY,

Defendant.

2:20-MC-00311-WBS-CKD

STIPULATION AND ORDER EXTENDING  
TIME FOR FILING A COMPLAINT FOR  
FORFEITURE AND/OR TO OBTAIN AN  
INDICTMENT ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and claimant Adrian Ortega (“claimant”), by and through their respective counsel, as follows:

1. On September 29, 2020, the claimant filed a claim in the administrative forfeiture proceedings with the Federal Bureau of Investigation with respect to the Approximately \$106,590.00 in U.S. Currency (hereafter “defendant currency”), which was seized on June 23, 2020.

2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative  
2 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of  
3 the parties. That deadline was December 18, 2020.

4 4. By Stipulation and Order filed December 18, 2020, the parties stipulated to extend to  
5 March 18, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
6 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
7 subject to forfeiture.

8 5. By Stipulation and Order filed March 19, 2021, the parties stipulated to extend to May  
9 17, 2021, the time in which the United States is required to file a civil complaint for forfeiture against  
10 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
11 forfeiture.

12 6. By Stipulation and Order filed May 18, 2021, the parties stipulated to extend to August  
13 16, 2021, the time in which the United States is required to file a civil complaint for forfeiture against  
14 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
15 forfeiture.

16 7. By Stipulation and Order filed August 17, 2021, the parties stipulated to extend to  
17 October 15, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
18 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
19 subject to forfeiture.

20 8. By Stipulation and Order filed October 18, 2021, the parties stipulated to extend to  
21 December 14, 2021, the time in which the United States is required to file a civil complaint for  
22 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
23 currency is subject to forfeiture.

24 9. By Stipulation and Order filed December 20, 2021, the parties stipulated to extend to  
25 February 14, 2022, the time in which the United States is required to file a civil complaint for forfeiture  
26 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
27 subject to forfeiture.  
28

1           10. By Stipulation and Order filed February 15, 2022, the parties stipulated to extend to  
2 March 16, 2022, the time in which the United States is required to file a civil complaint for forfeiture  
3 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
4 subject to forfeiture.

5           11. By Stipulation and Order filed March 16, 2022, the parties stipulated to extend to May  
6 16, 2022, the time in which the United States is required to file a civil complaint for forfeiture against  
7 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
8 forfeiture.

9           12. By Stipulation and Order filed May 17, 2022, the parties stipulated to extend to July 15,  
10 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
11 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
12 forfeiture.

13           13. By Stipulation and Order filed July 14, 2022, the parties stipulated to extend to  
14 September 13, 2022, the time in which the United States is required to file a civil complaint for  
15 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
16 currency is subject to forfeiture.

17           14. By Stipulation and Order filed September 19, 2022, the parties stipulated to extend to  
18 November 10, 2022, the time in which the United States is required to file a civil complaint for  
19 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
20 currency is subject to forfeiture.

21           15. By Stipulation and Order filed November 14, 2022, the parties stipulated to extend to  
22 January 9, 2023, the time in which the United States is required to file a civil complaint for forfeiture  
23 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
24 subject to forfeiture.

25           16. By Stipulation and Order filed January 10, 2023, the parties stipulated to extend to  
26 March 10, 2023, the time in which the United States is required to file a civil complaint for forfeiture  
27 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
28 subject to forfeiture.

1           17. By Stipulation and Order filed March 13, 2023, the parties stipulated to extend to May 9,  
2 2023, the time in which the United States is required to file a civil complaint for forfeiture against the  
3 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
4 forfeiture.

5           18. By Stipulation and Order filed May 8, 2023, the parties stipulated to extend to July 7,  
6 2023, the time in which the United States is required to file a civil complaint for forfeiture against the  
7 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
8 forfeiture.

9           19. By Stipulation and Order filed July 10, 2023, the parties stipulated to extend to August  
10 4, 2023, the time in which the United States is required to file a civil complaint for forfeiture against  
11 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
12 forfeiture.

13           20. By Stipulation and Order filed August 4, 2023, the parties stipulated to extend to  
14 September 1, 2023, the time in which the United States is required to file a civil complaint for forfeiture  
15 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
16 subject to forfeiture.

17           21. By Stipulation and Order filed August 30, 2023, the parties stipulated to extend to  
18 October 31, 2023, the time in which the United States is required to file a civil complaint for forfeiture  
19 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
20 subject to forfeiture.

21           22. By Stipulation and Order filed October 31, 2023, the parties stipulated to extend to  
22 November 30, 2023, the time in which the United States is required to file a civil complaint for  
23 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
24 currency is subject to forfeiture.

25           23. By Stipulation and Order filed December 1, 2023, the parties stipulated to extend to  
26 January 29, 2024, the time in which the United States is required to file a civil complaint for forfeiture  
27 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
28 subject to forfeiture.

1           24. By Stipulation and Order filed January 30, 2024, the parties stipulated to extend to  
2 March 29, 2024, the time in which the United States is required to file a civil complaint for forfeiture  
3 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
4 subject to forfeiture.

5           25. By Stipulation and Order filed March 21, 2024, the parties stipulated to extend to April  
6 29, 2024, the time in which the United States is required to file a civil complaint for forfeiture against  
7 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
8 forfeiture.

9           26. By Stipulation and Order filed April 30, 2024, the parties stipulated to extend to May  
10 29, 2024, the time in which the United States is required to file a civil complaint for forfeiture against  
11 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
12 forfeiture.

13           27. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further  
14 extend to June 28, 2024, the time in which the United States is required to file a civil complaint for  
15 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant  
16 currency is subject to forfeiture.

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

28. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to June 28, 2024.

DATED: 5/28/2024

PHILLIP A. TALBERT  
United States Attorney

By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney


DATED: 5/28/2024

/s/ Julissa Echevarria  
JULISSA ECHEVARRIA  
Attorney for claimant Adrian Ortega

(Authorized via phone)

IT IS SO ORDERED.

Dated: May 29, 2024

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE